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## NOTE: CHANGES HAVE BEEN MADE TO THIS DOCUMENT

Attorneys for Defendants, ORANGE COUNTY DEPUTY SHERIFF PAUL  
McHUGH

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

JAY EDSON SLADE, JR., Plaintiff,  
vs.  
COUNTY OF ORANGE, a Public Entity of the State of California;  
Orange County Deputy Sheriff P. MC HUGH, individually and as an Orange County Deputy Sheriff; TONY LA RUFFA; DOES 1 through 10, Defendants.)  
) Case No. SACV 06-545 AG (ANx)  
) Assigned for All Purposes to the Honorable Andrew J. Guilford Courtroom 10D  
) [PROPOSED] JUDGMENT

///

1        This action came on regularly for trial on February 5, 2008 in Courtroom 10-  
2 D of the United States District Court, Central District of California located at 411  
3 4<sup>th</sup> Street, Santa Ana, California, the Honorable Andrew J. Guilford, presiding.  
4 Plaintiff, Jay Edson Slade, Jr. ("Plaintiff") appeared by attorneys Emile Mullick  
5 and Genaro Lara. Defendant Paul McHugh appeared by attorneys S. Frank Harrell  
6 and Jason M. McEwen of Lynberg & Watkins. Defendant Anthony La Ruffa  
7 appeared by his attorney, Edward Hess. A jury of eight persons was empaneled  
8 and sworn. After hearing all of the evidence, the Court duly instructed the jury and  
9 the cause was submitted to the jury. On February 8, 2008, the jury returned into  
10 Court with a Special Verdict as follows:

11 **SPECIAL VERDICT FORM**

12 **QUESTION 1**

13        Did Defendant Deputy Paul McHugh, while effectuating the arrest of  
14 plaintiff Jay Edson Slade, handcuff him, and then push him over a flower pot?  
15

16        Yes \_\_\_\_\_                  No   X    
17

18        If your answer to Questions 1 was "no" please proceed to Question 4. If  
19 your answer was "yes" to question 1 please proceed to Question 2.  
20

21 **QUESTION 2**

22        Did Defendant Deputy Paul McHugh cause plaintiff to suffer damages as a  
23 result of Defendant McHugh's actions on August 11, 2005?  
24

25        Yes \_\_\_\_\_                  No \_\_\_\_\_  
26

27        If your answer to Question No. 2 was "yes", proceed to Question No. 3. If  
28 your answer was "no", please proceed to Question 4.

### **QUESTION NO. 3**

Please indicate the amount of damages plaintiff was caused to suffer as a result of the actions of defendant Paul McHugh on August 11, 2005.

Economic: \$\_\_\_\_\_

Non-Economic: \$ \_\_\_\_\_

## **QUESTION NO. 4**

Did Tony La Ruffa wrongfully cause a criminal proceeding to be brought against Jay Edson Slade, Jr.?

Yes \_\_\_\_\_ No \_\_\_\_\_ X

If your answer to Question No. 4 was “no”, please have your foreperson sign and date this Special Verdict Form. If your answer to Question No. 4 was “yes”, please proceed to Question No. 5.

## **QUESTION NO. 5**

Was Plaintiff Jay Edson Slade, Jr. harmed by the acts of Defendant Tony La Ruffa?

**Yes** \_\_\_\_\_ **No** \_\_\_\_\_

If your answer to Question No. 5 was “no”, please have your foreperson sign and date this Special Verdict Form. If your answer to Question No. 5 was “yes”, please proceed to Question No. 6.

## **QUESTION NO. 6**

Was Defendant Tony La Ruffa's conduct a substantial factor in causing Plaintiff Jay Edson Slade's harm?

**Yes**                                    **No**

If your answer to Question No. 6 was “no”, please have your foreperson sign and date this Special Verdict Form. If your answer to Question No. 6 was “yes”, please proceed to Question No. 7.

1  
2 **QUESTION NO. 7**

3 What amount, if any, do you award Jay Edson Slade, Jr. as compensatory  
4 damages for harm caused by Defendant Tony La Ruffa?

5 Answer in dollars or NONE. \$\_\_\_\_\_

6  
7 **NOW, THEREFORE, IT IS ORDERED, ADJUDGED AND DECREED**  
8 as follows:

9 Defendants Paul McHugh and Anthony La Ruffa shall have Judgment in  
10 their favor and that Plaintiff, Jay Edson Slade, Jr. shall take nothing by way of his  
11 operative complaint against Defendants.

12 Defendants shall recover from Plaintiff, their costs of suit in accordance with  
13 applicable law; and that ~~this matter be, and hereby is, dismissed as to Defendants~~  
14 ~~with prejudice~~ judgment be entered.

15 **IT IS SO ORDERED.**

16   
17 HON. ANDREW J. GUILFORD  
18 United States District Court Judge